

exercising its voting rights unless other, less interested CLECs, actively participated. As a result, Staff recommended (like the CLECs) that in an OIS vote, a majority decision of the qualified CLECs who choose to participate in such vote should be mandated rather than a quorum-oriented procedure. Staff's recommendation was based upon the current minimal level of participation in various administrative proceedings, including this docket, of CLECs who are licensed in the state. (Only 10 of 280 to 300 eligible CLECs participated in the Petition.)⁵⁰

And, even though Staff agrees with Ameritech that the Change Management Process (CMP) is an ongoing process which requires the participation of the CLECs, the reality is that all CLECs do not actively participate in market-defining issues such as the OSS. Thus, any requirement that a quorum⁵¹ of all qualified CLECs must participate is impractical. In fact, such a rule may hinder the process rather than create an opportunity for an efficient and fair OIS voting process. For instance, the failure to achieve a quorum (through no fault of those CLECs who do participate) will result in Ameritech's implementation of a change without the affected CLECs' being able to vote on the issue.

Also, Staff recommended that the Commission mandate that the parties abide by two principles in all OIS proceedings: the free exchange of ideas and information between the CLECs and Ameritech; and good faith negotiations in resolving any issue. Abiding by these principles will accomplish an effective and efficient OIS voting procedure. Staff believes that an atmosphere where there is a free exchange of ideas

⁴⁹ Id. at 23.

⁵⁰ Tr. at 119.

⁵¹ In stating the requirement as a "quorum," Staff is fully cognizant of Ameritech's alternative provision for a minimum participation of 8 qualified CLECs. Staff will employ the term "quorum" as a shorthand for both

and information between the CLECs and Ameritech needs to exist.

Staff believes the suggestion that Ameritech will be the custodian of the list of qualified CLECs particular issue has certain drawbacks. AT&T, in its Initial Comments, noted a concern that "the parties and number that would constitute th[e] quorum is known to SBC/Ameritech alone."⁵² Staff shared the concern that the process would prohibit an exchange of information and could prevent fully informed OIS votes. With the intent of addressing this concern, Staff proposed that the OIS qualified CLEC voting list should be shared with the Commission and all qualified CLECs on an issue-by issue basis. The Staff also posited that the Commission should act as final arbiter of any unresolved OIS votes.

It was understood by Staff that the list of CLECs that qualified for any OIS vote could not be circulated without the consent of the CLECs. It was not disputed that the CLECs claimed certain confidentiality concerns regarding being revealed as a qualifying (or by elimination, a non-qualifying) CLEC. Nevertheless, the Staff believed its suggestion would lead to a better process. (See, the statement by AT&T witness Coughlan that "especially if we don't know who those parties are that would make up that quorum, there's no way for us to force them to participate if it's not going to affect them."⁵³) However, it became clear at the hearing that the CLECs could not uniformly agree to waive these concerns.⁵⁴ Accordingly, Staff no longer proposes that the identity of qualified CLECs be shared. Staff also no longer suggests that the Commission act as arbiter of any unresolved OIS votes. Staff now believes that the position agreed

measurements.

⁵² AT&T Initial Comments at 14.

⁵³ Tr. at 116.

⁵⁴ Tr. at 108-110.

upon between Ameritech and the CLECs in the drafting of the CMP process – that a tie vote is resolved in favor of implementation – is appropriate.

Staff continues to support the position that OIS issues should ultimately be decided by a majority of those participating in the vote. This takes cognizance of the reality that the level of participation of CLECs in Illinois is not significant, and, thus, the possibility of a quorum is not realistic. As established during the hearings, some 280 to 300 CLECs were notified by the Commission of the pendency of this proceeding.⁵⁵ Nevertheless, only 10 - 14 CLECs actually participated. Second, the participation of any individual CLEC likely will be based on whether the CLEC has any interest at stake or not, and not simply that a vote has been called.

Finally, Staff recommended that the CLECs and Ameritech schedule joint reviews of the OIS process as a monitoring safeguard at least twice during the year following its adoption. The recommended review would ensure that the process is fair to all parties. A continuing review is warranted because the process is new and untested. The review will provide a basis to determine whether changes to the process might be appropriate.

E. STAFF'S RECOMMENDATIONS

Staff recommends the following under the OIS process:

- a. a majority decision of qualified CLECs participating on a particular vote should be approved, rather than the quorum-oriented procedure advocated by Ameritech;

⁵⁵ Tr. at 119.

b. the CLECs and Ameritech should schedule a joint review of the OIS process six months and, again, twelve months after the final approval of the CMP to ensure that the process is working appropriately for all parties.

Issue #6: OSS System Interface Availability

A. ISSUE

Hours of system availability are those hours that SBC/Ameritech can guarantee their operational support systems (OSS) will be in operation and available for use by the CLECs.

B. CLEC POSITION

The CLECs are concerned that there is a substantial difference between the hours pre-ordering systems are available and the hours ordering systems are available. The CLECs assert that there is a need for uniformity in the hours of operation of pre-ordering and ordering systems because the preordering functions support ordering capability.⁵⁶ Where hours of system availability differ, it is difficult for CLECs to accurately complete an order, and efficiency is reduced. CLECs further believe that the hours of availability for Ameritech's maintenance and repair systems are not acceptable. There are three (3) functional areas that are in dispute:

1. Pre-Order/CSR: Ameritech does not maintain any Sunday hours, whereas the CLECs require Sunday hours because they use those hours to work on

rejected orders.⁵⁷ In order to handle these rejected orders; CLECs need access to pre-order/Customer Service Record (CSR) information on Sundays. Pre-order/CSR availability must be consistent with ordering hours.⁵⁸ The CLECs want the hours of availability for both pre-order and order interfaces to be synchronized.⁵⁹

2. Trouble Administration, Maintenance and Repair: CLECs request that the system be available 24 hours day, 7 days a week, as is the case in Verizon's New York service territory,⁶⁰ and as Ameritech provides its own retail customers. At the hearings, Ameritech witness Cullen confirmed that this function was available for retail operations on Sunday.⁶¹ The CLECs want the same hours of availability for their customers.⁶²

3. Ordering: CLECs want the ordering systems to be available 24 hours a day, 7 days a week, as Verizon makes such systems available in New York.⁶³ Also, the CLECs point out that the ordering systems do not need to be switched off for maintenance every night. In fact, the CLECs claimed that Verizon completes its maintenance in about one hour once a month.⁶⁴ During the maintenance hour, the CLECs can do back-end work until the maintenance is completed.⁶⁵

⁵⁶ Tr. at 277.

⁵⁷ Id.

⁵⁸ See Corecomm Illinois, Inc. ("Corecomm Comments") Initial Comments at 8-9.

⁵⁹ See WorldCom, Inc. ("WorldCom Comments") Verified Initial Comments at 4-5.

⁶⁰ See id. at 5.

⁶¹ Tr. at 200.

⁶² WorldCom Comments at 5.

⁶³ Id.

⁶⁴ Id.

⁶⁵ Id.

C. SBC/AMERITECH POSITION

In the process of the OSS collaborative meetings, Ameritech offered to increase the availability of its ordering systems to 133 hours (from 6AM to 1AM, Central Standard Time, 7 days a week) consistent with the commitments made by the SBC in the FCC's Uniform and Enhanced collaborative. Both the pre-ordering and maintenance and repair interface hours of availability would also be expanded. However, Ameritech states that it is not practical to make all OSS interfaces available 24-hour a day, 7 days a week, because of the need for the "back-end systems" to be taken off-line for regular maintenance and upgrade activity.⁶⁶ Furthermore, Ameritech has studied the possibility of continuous availability and states that the decision to provide continuous service comes down to a tradeoff between the cost to provide it and the increased efficiency in offering the extended service hours.⁶⁷

Ameritech states that the differences in availability between the ordering and pre-ordering interfaces is due to the fact that different systems are involved.⁶⁸ In its Initial Comments, Ameritech also states that it "continues to work on the possibility of expanding pre-ordering hours to Sunday. . .[.]"⁶⁹ At the hearings, Ameritech stated that it was prepared to provide pre-order accessibility on Sunday but that it could not provide regular Sunday hours.⁷⁰ Instead, Ameritech proposes to notify the CLECs in advance via accessible letters⁷¹, identifying the Sunday hours that would become available.⁷²

⁶⁶ Ameritech Initial Comments at 27-8.

⁶⁷ See Tr. at 231; Ameritech Response to Staff Data Requests 6-3.03 and 6-3.04.

⁶⁸ Ameritech Initial Comments at 26-27.

⁶⁹ Id at 30.

⁷⁰ Tr. at 215.

⁷¹ Id. at 216, 225.

Ameritech also takes the position that all hours of availability are equal to or even exceed those for Ameritech's own retail operations.⁷³

In terms of maintenance and repair, Ameritech states that the CLECs can report problems via Ameritech's Electronic Bonding Trouble Administration (EBTA) or the Local Operations Center. EBTA provides the CLECs the ability to electronically report problems. EBTA is available 24 hours per day, seven days a week, except Sunday morning from 12 am to 4 am, and some weekday evenings from 10:30 to 11:30 pm.⁷⁴ When the EBTA is not available, either because it is being serviced during the aforementioned hours, or is out-of-service, the CLECs can call the LOC because it is operational at all times.⁷⁵

D. STAFF POSITION

Staff's position has changed.

The issue of system availability is of paramount importance as it may affect the efficiency of the business process as it translates to the residential end-user, and it may affect a wholesale service provider's reputation for providing reliable service to its customers. Bearing these realities in mind, Staff believes that CLECs should have access to the OSS such as allows a CLEC to provide service to customers (as it relates to pre-ordering, ordering, and maintenance and repair), in a manner that enables it to effectively compete with Ameritech. Therefore, SBC/Ameritech should provide OSS accessibility that is technically feasible for its system, is of a reasonable minimum

⁷² Tr. at 214-15.

⁷³ Id at 25.

⁷⁴ Tr. at 217-18.

⁷⁵ Tr. at 242; Ameritech Initial Comments at 30.

duration that is comparable to other incumbent carriers across the country, and is coordinated with the CLECs operations.

Technical Feasibility: Staff agrees with SBC/Ameritech that, while providing OSS service twenty-four hours per day for seven days a week may be technically feasible, at this time it would be cost ineffective. The additional efficiencies realized by implementing an OSS system which operates 24X7, in comparison to an OSS system operating for approximately 18-22 hours per day, do not justify the additional costs associated with implementing such a system. This conclusion is based on several factors. The Service Order system was put into operation two to three years ago, took seven years to implement and cost \$100 million.⁷⁶

Second, Ameritech also conducted two studies. One to investigate the feasibility of providing extended hours of operation for ordering and billing interfaces and a second to investigate the feasibility of providing some systems on a 24X7 basis.⁷⁷ In this study, Ameritech examined the costs of providing ordering and billing on a 24X7 basis. Based on the information collected, Ameritech determined the approximate cost to provide access to these applications twenty-two hours per weekday and sixteen hours per weekend, as well as to provide 24X7 access.⁷⁸ Ameritech did not indicate what the volume usage was during the extended hours trial period, but it did state that there was "insufficient customer response to warrant the expense" of extended hours.⁷⁹ Third, Ameritech stated that, if it were ordered to provide 24X7 access, it would not be

⁷⁶ Tr. at 235.

⁷⁷ Ameritech Response to Staff Data Request 6-3.03.

⁷⁸ Id.

⁷⁹ Id.

able to move to a system to support the request within 15 months.⁸⁰ In light of this information, while it is *possible* for Ameritech to implement a 24X7 system, it is more efficient and cost-effective for Ameritech to implement a system that provides longer hours than currently provided but not one that has 24X7 access.

Reasonable Minimum Duration of OSS Availability: In establishing reasonable minimum standards for network availability the CLECs urge the Commission to require SBC/Ameritech to emulate the practices of other regional incumbent carriers, specifically Bell Atlantic (Verizon) and Bell South.

The CLECs state that legally Ameritech must be compelled to provide Sunday hours because Southwestern Bell Telephone voluntarily “expanded and synchronized hours of availability for its pre-order and maintenance and repair systems in Texas.”⁸¹ The CLECs’ rationale for this argument is that Merger Order Condition 27(a)⁸² essentially requires SBC/Ameritech to provide services to a CLEC that are equal to what an SBC ILEC affiliate provides in its region, to the extent that provision of those services is neither required as a result of an arbitration nor in violation of Illinois law.⁸³ However, this argument is untenable because Condition 27 applies to interconnections, rather than to OSS. Therefore, the Staff does not believe that the Commission is required to consider the practices of Bell Atlantic or Bell South as binding

This having been said, the practices of Verizon and Bell South certainly constitute evidence of an incumbent carrier’s capabilities with respect to OSS. Staff has determined that both carriers’ make OSS accessible to CLECs for ordering and

⁸⁰ Tr. at 234.

⁸¹ WorldCom Initial Comments at 4.

⁸² Order No. 98-0555 at 234.

⁸³ Id.

pre-ordering during Saturday and Sunday hours.⁸⁴ For CLEC maintenance and repair requests, Verizon sets a specific downtime for maintenance and repair of OSS systems, while the Network Reliability Center of Bell South is manned 24 hours a day, 7 days a week.⁸⁵ Indeed, SBC in Texas provides Sunday Pre-Ordering and CSR hours. From these examples, it is evident that ILECs can successfully provide an “around-the-clock” system of OSS. Therefore, SBC/Ameritech should be required to provide greater availability to its OSS.

SBC/Ameritech advances two arguments for not offering service comparable to Verizon and Bell South. First, SBC/Ameritech argues its system should not be compared to either Verizon’s or Bell South’s system because the systems are different. Second, SBC/Ameritech asserts that coordination of maintenance and repairs is difficult for SBC/Ameritech because of the complexity of its network.⁸⁶

SBC/Ameritech argues that its network is different from those used by Verizon and Bell South because its data is stored, accessed, backed up, secured and maintained in a manner different from the manner used by those companies.⁸⁷ Staff acknowledges that Ameritech’s system is complex, and that some time is required for system maintenance. However, as has been stated previously, other ILECs have demonstrated that they can operate with minimum downtime. Additionally, SBC/Ameritech stated that it is in the process of determining how it can provide pre-ordering capabilities on Sunday to CLECs,⁸⁸ and that it is in the process of trying to

⁸⁴ See for Bell Atlantic: http://www.bellatlantic.com/wholesale/html/cd_sys_avail.htm. For BellSouth : http://www.interconnection.bellsouth.com/oss/oss_hour.html

⁸⁵ Id.

⁸⁶ Ameritech Initial Comments at 25.

⁸⁷ Id.

⁸⁸ Tr. at 225.

coordinate a set maintenance schedule.⁸⁹ SBC/Ameritech will have established a maintenance schedule within six (6) to eight (8) weeks.⁹⁰

Staff concludes that SBC/Ameritech should be required to increase the number of hours OSS is accessible to CLECs on a weekly basis, coordinate its network maintenance and repair schedule so as to minimize OSS system downtime, maximize weekend access for itself and the CLECs to the OSS and set a consistent schedule with pre-arranged times for system maintenance. Access times and duration to the OSS system for the CLECs should be the same as for Ameritech, and the CLECs should be granted the same access to OSS for Trouble Administration/Maintenance and Repair that Ameritech technicians have to the system.⁹¹

Coordination of Operations: For the CLECs to effectively compete, SBC/Ameritech must develop a process to notify CLECs when the OSS systems are not accessible. Staff recognizes that SBC/Ameritech needs time to maintain, repair and upgrade its system. Therefore, the issue is how to best maintain the system, while at the same time maximizing the CLECs' access to the system to the point that CLEC access is comparable to that of SBC/Ameritech.

Ameritech's systems require reasonable downtimes for network maintenance. In response to Staff Data Request 6-5.11, Ameritech stated that "maintenance windows will typically provide limited availability on Sundays, but the specific hours vary from week to week. Ameritech Illinois can notify the CLECs when the Sunday maintenance

⁸⁹ Tr. at 222-23.

⁹⁰ Id.

⁹¹ WorldCom's Response to Staff Data Request 6-3.01 (stating that CLECs should have the same access to the OSS system as Ameritech technicians.)

schedule is finalized.”⁹² In response to Staff’s Record Data Request #2 WorldCom stated that Verizon, as part of its Change Management process, posts on its website the exact hours that all systems will be unavailable due to actual system maintenance, three months in advance of those dates.⁹³ Therefore, Staff recommends that, at a minimum, Ameritech should set a date or day, and a format by which it will notify CLECs when its OSS system will be inaccessible for repairs, maintenance or upgrade.

SBC/Ameritech should make both pre-ordering and ordering available concurrently, or in the alternative, pre-ordering should be available for a longer period than ordering. The CLECs state that access to the system for pre-ordering and ordering is vital to them.⁹⁴ CLECs prefer that ordering and pre-ordering be available concurrently.⁹⁵

The apparent disparity which exists between the proposed hours of availability for pre-ordering and ordering interfaces should be eliminated. SBC/Ameritech should provide the same hours for both pre-ordering and ordering. It appears illogical to offer extended hours for the ordering interface but not the pre-ordering interface, since the pre-ordering interface needs to be accessed to prepare orders in the first place. Also, a CLEC cannot provide a customer with any information regarding order completion date, verification of billing address and details about a customer’s service status without having access to the pre-ordering interface.⁹⁶ Thus, there should be uniformity in the hours of availability of the pre-ordering interface and the ordering interface. If there has to be a disparity between the hours, then the pre-ordering interfaces should be

⁹² Ameritech Response to Staff Data Request 6-5.11.

⁹³ WorldComs’ Response to Staff’s Record Data Request #2.

⁹⁴ WorldCom Initial Comments at 2.

⁹⁵ Id.

available for an extended period over the ordering hours, because pre-ordering functions occur in “real time”⁹⁷. Real time pre-ordering means that the CLEC uses the pre-ordering interface while the customer is on the telephone, enabling the CLEC representative to check addresses, current services being provided, and potential services available to the customer in order to better serve him or her.⁹⁸ This allows CLECs to perform all of their pre-ordering activities and then send in the order to be processed. If the ordering interfaces are not available, SBC/Ameritech should hold the request in a queue until the point in time that the ordering systems become available again.

Staff concludes that both the pre-ordering and ordering interfaces should be available simultaneously.⁹⁹

E. STAFF’S RECOMMENDATIONS

The Staff recommends the following:

- a. SBC/Ameritech should not be required to provide OSS accessibility 24X7, but the Commission should require SBC/Ameritech to offer Saturday and Sunday hours for all interfaces – pre-ordering, ordering and maintenance and repair.
- b. SBC/Ameritech should be required to provide access 140 or more hours per week to both the pre-ordering and ordering interfaces. The increase in hours of access should be a gradual transition. The transition period should not exceed six months.

⁹⁶ Tr. at 192 –206.

⁹⁷ Tr. at 239-40.

⁹⁸ Tr. at 239-40.

⁹⁹ See Joint Submission of the Amended Plan of Record for Operations Support Systems (“OSS”) Plan of Record (hereinafter “POR”) at 66. The POR provides for 6AM-1AM hours of availability for the Ordering interface but nothing is set aside for the Pre-Ordering interface.

SBC/Ameritech should provide monthly reports to the Commission stating hours of actual availability for the previous month. At the end of the six month period Ameritech should provide accessibility for ordering and pre-ordering between 6am and 1am for every day of the week.

- c. SBC/Ameritech should establish a regular maintenance and repair interval for all days of a month and post it on its website as an accessible letter. The posting should be provided on the first working day of each month for the following month (i.e., SBC/Ameritech should post September 2000 network maintenance times on August 1, 2000). This will allow wide dissemination and facilitate easy access by the CLECs. It will also allow the CLECs to plan their own time around the maintenance and repair hours rather than being dependent on Ameritech's schedule. Staff recommends that maintenance and repair work should be conducted between 1am and 5am.¹⁰⁰
- d. Pre-ordering and ordering interfaces should be available concurrently. In the alternative, if the pre-ordering and ordering interfaces cannot be provided concurrently at all times, then the pre-ordering interface should be granted the longer duration. SBC/Ameritech should be ordered to gradually expand the hours of availability for both the pre-ordering and ordering interfaces from its current 133 hours a week to 140 hours a week over a 6-month period.¹⁰¹ The hours should be between 5am and 1am as opposed to Ameritech's proposal of 6am-10pm for the pre-ordering interface and 6am-1am for the ordering.

¹⁰⁰ See POR at 66.

¹⁰¹ See POR at 65.

- e. Maintenance and repair should be set at intervals and posted on the SBC/Ameritech website. This will allow wider dissemination and facilitate easy access for the CLECs. It will also allow the CLECs to plan their own time around the maintenance and repair hours rather than being dependent on Ameritech's schedule. Ameritech should provide regular Saturday and Sunday hours of availability, and should circulate hours of availability to the CLECs. Staff recommends that both pre-ordering and ordering interfaces be available between 5am and 1am.
- f. Staff recommends that the Commission require SBC/Ameritech provide monthly a report on changes to the hours of availability for all domain areas. Specifically the Commission should require SBC/Ameritech to provide this report to the Commission no later than the 15th of each month. Any changes from the previous report should also be noted and an explanation should be provided for those changes. The Commission should also direct these reports be verified by an SBC/Ameritech officer.

Issues #9, 16, 19, 20, 24, 40: Interface Development Rule

A. ISSUE

The interface development rule will establish a process by which the CLECs review and revise detailed specifications in collaboration with Ameritech. This rule will also establish an arbitration process to resolve disputes that arise related to such specifications.

B. CLEC POSITION

The CLECs argue that SBC/Ameritech has failed, in the course of the collaborative process in this docket, to disclose with sufficient particularity, detailed specifications and business rules for its proposed OSS interfaces and enhancements. This failure, the CLECs assert, has prevented them from making any determination regarding how the interfaces and enhancements will function, which in turn prevents them from designing their own corresponding systems and procedures to operate on their side of the OSS interface. The CLECs argue that SBC/Ameritech was required, under Condition 29 of the Merger Order, to provide this information to them in the course of the collaborative process; they cite, in support of this proposition, Chairman Mathias' letter of February 17, 2000, in which the Chairman gave it as his opinion that SBC/Ameritech was required to provide the information with the specificity and particularity sought by the CLECs.

The CLECs state that, since SBC/Ameritech has failed to provide detailed specifications and business rules for its proposed OSS interfaces and enhancements, they cannot accept the Plan of Record. They propose, however, an "Interface Development Rule," which would, if adopted, establish a process for resolving these issues, as follows:

- SBC/Ameritech provides the detailed specifications and business rules which the CLEC seeks, simultaneously providing a document which correlates the specifications and rules to the relevant business standards;
- SBC/Ameritech and the CLECs engage in expedited collaborative discussions to resolve those disputes regarding the specifications and business rules which can be resolved;

- Issues remaining in dispute at the conclusion of the collaborative discussions are submitted to the Commission for arbitration under the Phase III arbitration procedures established by Condition 29.

The CLECs urge the Commission to adopt this procedure, and to authorize the CLECs to arbitrate unresolved issues under Phase III procedures. The CLECs' position appears to be unchanged.¹⁰²

C. SBC/AMERITECH POSITION

SBC/Ameritech concedes that it has not revealed detailed information regarding specifications and business rules, but asserts that this is due to the fact that this is not the result of any willful failure to disclose on SBC/Ameritech's part, but rather is due to the fact that the information is not yet known to SBC/Ameritech. SBC/Ameritech asserts, however, that this does not, in fact, prejudice the CLECs in any meaningful way, because of the fact that the CLECs may seek resolution of these issues under the so-called Change Management process, and a subprocess of that, namely Outstanding Issue Solution, which, in essence, resolves outstanding OSS interface issues by a vote taken among CLECs. SBC/Ameritech states that this process has been used successfully in the collaborative processes leading up to its Section 271 approval in Texas, and that the FCC views this process with favor.

SBC/Ameritech contends that, by contrast, the Interface Development Rule proposed by the CLECs would, in practice, allow a single aggrieved CLEC to prevent implementation of OSS interface practices which other CLECs endorse, a result which SBC/Ameritech views as undemocratic. Further, SBC/Ameritech asserts that Condition 29 procedures do not permit the arbitration of the specification / business rule issue in

the context of Phase III, but rather afford the remedy of arbitration only where issues exist relating to implementation.

Accordingly, SBC/Ameritech urges the Commission to reject the Interface Development Rule proposed by the CLECs, and instead to find that the Change Management Process that it proposes is the proper manner in which to resolve OSS interface issues.

Ameritech's position appears to be substantially unchanged.¹⁰³

D. STAFF POSITION

Staff's position has not changed.

Merger Condition 29 provides, in relevant part, as follows:

Additional OSS - Joint Applicants will comply with the following OSS commitments:

A. OSS Conditions

Joint Applicants will meet the following timetables and milestones regarding integration of OSS processes in Illinois:

Joint Applicants shall implement a comprehensive plan for improving the OSS systems and interfaces available to CLECs in Illinois. The Joint Applicants' plan shall consist of the following commitments.

Application-to-Application Interfaces Commitments

SBC/Ameritech Illinois will deploy, in accordance with the schedule noted below, commercially ready, application-to-application interfaces as defined, adopted, and periodically updated by industry standard setting bodies for OSS (e.g., Electronic Data Interchange ("EDI") and Electronic Bonding Interface ("EBI")) that support pre-ordering, ordering, provisioning, maintenance and repair, and billing for resold services, individual UNEs, and combinations of UNEs.

¹⁰² Tr. at 169, 181-82, 184-87.

¹⁰³ Tr. at 131, 139, 153-54, 157, 166.

Deployment of the application-to-application interfaces will be carried out in three phases.

- *Phase 1:* Within 3 months after the Merger Closing Date or final regulatory approval, Joint Applicants shall complete a publicly available Plan of Record which shall consist of an overall assessment of SBC's and Ameritech's existing OSS interfaces, business processes and rules, hardware and data capabilities, and security provisions, and differences, and the companies' plan for developing and deploying application-to-application interfaces and graphical user interfaces for OSS, as well as integrating their OSS processes. The Plan of Record shall be accepted, or rejected, by this Commission after an expedited (two week) CLEC comment cycle.
- *Phase 2:* SBC/Ameritech shall work collaboratively with ICC Staff and Illinois CLECs, in a series of workshops, to obtain written agreement on OSS interfaces, enhancements, and business requirements identified in the Plan of Record. If the CLECs and SBC/Ameritech have not reached agreement after one month of such sessions (unless there is a mutually agreeable extension or a Commission order extending this date after a reasonable request is made by a participating party to continue negotiations), the parties shall prepare a list of the unresolved issues in dispute and submit the remaining unresolved issues in dispute to arbitration by the Commission. Any arbitration shall be conducted before the Commission with the assistance of an independent third party with subject matter expertise. In the event that SBC/Ameritech and the participating Illinois CLECs are able to come to written agreement regarding some OSS issues, but not all, those issues that have been agreed to shall immediately proceed to Phase 3.
- *Phase 3:* SBC/Ameritech shall develop and deploy, on a phased-in basis, the system interfaces, enhancements and business requirements consistent with the written agreement obtained in Phase 2. If one or more CLECs contend that SBC/Ameritech has not developed and deployed the system interfaces, enhancements, and business requirements consistent with the written agreement obtained in Phase 2, or has not complied with the Commission's decision received in Phase 2, they may file a complaint with the Commission which shall arbitrate the issue(s) consistent with the procedures identified in Phase 2 except that this arbitration shall be concluded within 2 months.¹⁰⁴

¹⁰⁴ Joint Application of SBC/Ameritech, ICC Docket No. 98-0555, *Final Order* at 253-55 (September 23, 1999).

SBC/Ameritech concedes that it has failed, for whatever reason, to provide all of the detailed specifications and business rules sought by the CLECs, and, indeed, required under Condition 29, but it apparently considers this a failure of no great moment. This, however, is at the crux of this issue, and the Staff recommends that the Commission adopt, in part, the CLEC's Interface Development Rule.

There is little question that, had SBC/Ameritech been forthcoming regarding detailed specifications and business rules for OSS interface during the collaborative process, the CLECs would have had the right to arbitrate any disputes regarding them. SBC/Ameritech, however, did not do so, despite the Chairman's admonition in Schedule A of his February 17 letter, and despite the matter having been raised during the collaborative process. SBC/Ameritech, in essence, asserts that its failure to produce the requested information should properly foreclose the CLECs' right to arbitrate, and instead, the CLECs should be compelled to rely upon a curious procedure never adopted, or even contemplated, in Condition 29 of the Illinois Merger Order in lieu of the arbitration that Condition 29 specifically orders.

Condition 29 specifically affords the CLECs the remedy of arbitration. If this in some way undermines a procedure sanctioned in Texas, then the reconciliation of the two differing remedies is SBC/Ameritech's problem, rather than the CLECs'. Arbitration is the Illinois-sanctioned remedy, which the Illinois Commission has deemed the proper way to resolve OSS interface disputes. SBC/Ameritech's attempt to foreclose, by its own failures and omissions, CLECs' rights in favor of a Texas remedy it appears to prefer, should be rejected by the Commission.

E. STAFF'S RECOMMENDATIONS

The CLECs have been denied the opportunity to arbitrate these issues in Phase II. Accordingly, they should be permitted to arbitrate them in Phase III. The Commission should adopt the proposed Interface Development Rule.

The CLECs propose a "mapping" requirement, which the Staff interprets as calling for a showing of the correlation between SBC/Ameritech specifications and practices, and industry standards. While the Staff does not endorse this aspect of the proposal, the CLECs and SBC/Ameritech, however, appear to have concluded an agreement, pursuant to which SBC/Ameritech will provide some form of "mapping"¹⁰⁵, an agreement which the Staff has no reason to oppose.

Issue #13: Customer Service Record (CSR) Address Validation

A. ISSUE

When a CSR (or order) is received by SBC/Ameritech, certain rules are applied to validate selected fields on the order, including the address field. Specifically this issue focuses on the request by CLECs to relax the validation rules that apply to the address fields on migration orders. This issue also pertains to the accuracy of the data in the Street Address Guide (SAG) and CSR databases.

¹⁰⁵ Tr. at 173-74.

B CLEC POSITION

A basis for a significant number of SBC/Ameritech rejections of CLEC orders is erroneous information, including addresses, on the order form. In some cases this is because the street address provided by a CLEC does not match the street address with which SBC/Ameritech typically validates orders.¹⁰⁶ Under the current procedure followed in the pre-ordering process, SBC/Ameritech provides CLECs access to the Customer Service Record (CSR) database, the CLECs then use the information in the CSR to populate the order they must provide SBC/Ameritech. Also, SBC/Ameritech provides CLECs access to the SBC/Ameritech Street Address Guide (SAG) database, which contains the valid street addresses of SBC/Ameritech end-users. According to the CLECs, these two databases do not always match in format and content. Depending on the type of order from the CLECs, SBC/Ameritech validates the order through either the CSR or the SAG database.¹⁰⁷

Furthermore, the CLECs experience problems with the accuracy of the SAG and CSR databases. For example, when CLECs send an order to SBC/Ameritech, SBC/Ameritech requires that CLECs provide the street address of the end-user. If the CLECs use the CSR to format the street address in an order, discrepancies both in format and content cause the order to be rejected even if the address provided matches the address information contained in the Ameritech's CSR. To overcome this problem, the CLECs want SBC/Ameritech to conform its CSR database to the SAG database by replacing anomalies in the CSR to correct address information, as prescribed by the

¹⁰⁶ AT&T Initial Comments at 26.

¹⁰⁷ AT&T Initial Comments at 26-27.

SAG.¹⁰⁸ AT&T posits this synchronization of the two data bases as a “long-term” project.¹⁰⁹ In Exhibit 1, Attached to AT&T’s Comments, AT&T identifies a date of March 2001 for the development of the synchronization process.¹¹⁰

The CLECs also want SBC/Ameritech to implement relaxed address validation for migration orders for resale, CPO and loop with number port by December 2000.¹¹¹ In other words, SBC/Ameritech will not require address validation at all on these limited sets of order types and the order will only be validated on the telephone number (TN) provided. Covad also objected to the fact that relaxed address validation will not be implemented for the line sharing orders.¹¹²

C. SBC/AMERITECH POSITION

SBC/Ameritech recognizes the importance of accurate end customer addresses in every CLEC order. As a result, the end customer information is considered to be critical and it is a required field for most order types. In fact, SBC/Ameritech recognizes the fact that it is a difficult piece of information for a CLEC to provide.¹¹³ Consequently, SBC/Ameritech agreed to make changes effective in December 2000 by starting the relaxed address validation for migration orders for resale, CPO, and loop with number porting, and also for loop number portability orders.¹¹⁴ Although it had earlier offered to provide Lite or Relaxed Validation by September, 2000, SBC/Ameritech felt that earlier implementation of these changes associated with CSR Address Validation was

¹⁰⁸ AT&T Initial Comments at 26 27.

¹⁰⁹ Id. at 29.

¹¹⁰ AT&T Exhibit 1, FMO, Section C, Ordering at 52-53.

¹¹¹ Id. at 52.

¹¹² Initial Comments of Covad Communications at 4-5.

¹¹³ Ameritech Illinois Initial Comments at 37.

problematic because of the efforts being made to effect changes in other OSS areas.¹¹⁵

Just prior to the hearing, Ameritech reassessed its workload and determined that Lite Validation could not be implemented prior to March 2001.¹¹⁶ That is the date reflected in Ameritech's Initial Comments.

In addition, at the hearing, Ameritech committed to Covad that Ameritech would be "relaxing the address validation requirements for line sharing orders along with other types when the relaxed validation is implemented in March 2001."¹¹⁷ In addition, Ameritech noted that it was considering Covad's request that to further extend Relaxed validation to stand-alone DSL loops, but was not willing to offer that at that time.¹¹⁸

D. STAFF POSITION

Staff position has changed

SBC/Ameritech offers to implement relaxed address validation (the so-called "Lite Edit") for resale, CPO and loop with number port in March 2001. Staff, however, continues to recommend that this proposal be made effective in December 2000. The time frame between December 2000 (considering the previously missed September 2000 implementation date) and March 2001 will make a difference both in terms of negative impact on the CLECs and the marketplace. The extra three months proposed by Ameritech for implementing this change could well affect the CLECs' ability to compete.

¹¹⁴ Id. at 38.

¹¹⁵ Tr. at 743-44, 767 and 769.

¹¹⁶ Tr. at 778-79.

¹¹⁷ Tr. at 727, 728.

¹¹⁸ Tr. at 732-33.

All parties are agreed that the system enhancements to enable Lite Validation will be made. The foremost issue is the timing of Lite Validation implementation. The judgement that must be made is between Ameritech's asserted need for additional time to implement Lite Validation and the CLECs assertions of delays and additional costs incurred in accomplishing customer service orders as a result of address-related order rejections.

The CLECs claim a 30 to 40 per cent order rejection rate due to address-related errors.¹¹⁹ Covad believes that the error rate would be reduced to below 5 per cent after the implementation of Lite Validation.¹²⁰ Ameritech does not dispute that the rejection rate will be reduced through the use of Lite Validation.¹²¹ The CLECs note that the cost to them of the continued higher rate of rejection of service orders includes lost time in implementing the orders, additional costs and employee time in reviewing the rejections and resubmitting the orders, and poor service from a customer viewpoint.¹²² These effects are exacerbated by the possibility of repeated rejections of orders.¹²³

Ameritech claimed that its workload necessitates moving the Lite Validation implementation date from December 2000 to March 2001.¹²⁴ However, Ameritech was unable to substantiate that claim.¹²⁵ Moreover, Ameritech never claimed that Lite Validation itself could not be delivered by December, 2000. Rather, the Company

¹¹⁹ Tr. at 792 (Covad), 794 (Rhythms, AT&T).

¹²⁰ Tr. at 800.

¹²¹ Ameritech Illinois Initial Comments at 38-39.

¹²² AT&T Initial Comments at 26; Covad Communications Initial Comments at 4; Tr. at 797-99.

¹²³ Tr. at 734-38.

¹²⁴ Ameritech Illinois Initial Comments at 38; Tr. at 778-80.

¹²⁵ Tr. at 780.

rather amorphously indicated that delivering Lite Validation by December 2000 would "perhaps" result in some other project being bumped to March 2001.¹²⁶

Since Ameritech has failed to substantiate its claim that delivery of Lite Validation should be delayed; and since Ameritech already has delayed the implementation from a proposed September date, Staff believes the balance on this issue swings in favor of the CLEC position, i.e., a mandated December 2000 implementation. Ameritech failed to establish with any certainty its contention that the earlier implementation date would cause difficulties. On the other hand, a later release will have negative consequences for the CLECs, as noted. Those negative consequences can and should be avoided. The Commission should order Ameritech to implement Lite Validation no later than December 2000.

Staff agreed with the Covad request that Lite address validation be extended to unbundled loops and line shared loops. At the hearing, Ameritech agreed to provide Lite Validation for unbundled loops and line shared loops. Staff believes that this should be implemented in December 2000 along with the migration orders for resale, CPO, and loop with number porting that SBC/Ameritech has already committed to supporting, rather than at the separate March 2001 commitment date made by Ameritech. Ameritech's witness stated that the Company intended to provide Lite Validation for all pertinent services at the same time. The witness agreed that this was because "the same system or process enhancement that would be used for those other types of services would also ... enable you to provide light [sic] address validation for line sharing, as well."¹²⁷

¹²⁶ Tr. at 779.

¹²⁷ Tr. at 745-46.